



Air Quality Permitting Technical Analysis

March 28, 2003

Tier I Operating Permit No. TI-030403

TESORO REFINING and MARKETING CO., BURLEY

AIRS Facility No. 031-00017

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Air Quality Division*

FINAL AMENDED TIER I OPERATING PERMIT

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

CFR	Code of Federal Regulations
DEQ	Idaho Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
Tesoro	Tesoro Refining and Marketing Company-Burley Terminal

1. PURPOSE

The purpose of this technical analysis is to satisfy the requirements of IDAPA 58.01.01.300-386, *Rules for the Control of Air Pollution in Idaho*, for Tier I Operating Permits.

On February 20, 2003, the Department of Environmental Quality (DEQ) received a submittal from Tesoro Refining and Marketing Company-Burley Terminal (Tesoro) requesting that DEQ administratively amend Permit Conditions 2.4, 2.8, 2.19.2, 2.23 and General Provisions 21.a and 24 in the facility's Tier I Operating Permit (OP) in accordance with IDAPA 58.01.01.381. Tesoro's request for a permit amendment is included in Appendix A of this technical analysis.

2. SUMMARY OF EVENTS

The following information is added to the summary of events in the technical analysis of the final Tier I Operating Permit prepared by Darrin Mehr of DEQ on August 2, 2002:

September 11, 2002 DEQ issued a final Tier I OP for Tesoro
February 20, 2003 Tesoro requested DEQ amend the facility's final Tier I OP

3. DISCUSSION

Amended Tier I Operating Permit

This project is to amend the following:

- a) Permit Condition 2.4, page 7 is changed to read as follows: "The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken. The term quarterly in this condition shall be defined on a calendar year basis (January 1 - March 31, April 1 - June 30, July 1 - September 30, and October 1 - December 31). In the interim period between June 11, 2003 and June 30, 2003 when the quarterly definition becomes effective, the permittee shall conduct at least one visible emissions inspection as required by this permit condition."
- b) Permit Condition 2.8, page 8 is changed to read as follows: "The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken. The term quarterly in this condition shall be defined on a calendar year basis (January 1 - March 31, April 1 - June 30, July 1 - September 30, and October 1 - December 31). In the interim period between June 11, 2003 and June 30, 2003 when the quarterly definition becomes effective, the permittee shall conduct at least one visible emissions inspection as required by this permit condition."

- c) Permit Condition 2.19.2, page 15 is changed to read as follows: "The permittee shall obtain documentation of the distillate fuel oil sulfur content from the refinery or refineries that produce(s) the fuel. Acceptable documentation shall include current contractual agreements which specify that the sulfur contents of distillate fuel oils entering the pipeline from the refinery are within the limits specified in this permit. In addition, the permittee shall determine the sulfur content in each distillate fuel storage tank on a semiannual basis by testing as specified in Permit Condition 2.19. Testing documentation shall identify the tank number and the ASTM Grade of the fuel stored in the tank at the time of testing. The term semiannual in this condition shall be defined on a calendar year basis (January 1 - June 30 and July 1 - December 31). In the interim period between March 11, 2003 and June 30, 2003 when the semi annual definition becomes effective, the permittee shall conduct at least one test required by this permit condition."
- d) Permit Condition 2.23, page 16 is changed to read as follows: "On the date the provisions of 40 CFR 60 Subpart XX become applicable to the source due to the construction, reconstruction or modification of the total loading rack that delivers petroleum product into gasoline tank trucks, the permittee shall immediately comply with the requirements of the Standards of Performance for Bulk Gasoline Terminals in accordance with 40 CFR 60, Subpart XX."
- e) General Provision 21.a, page 23 is changed to read as follows: "The compliance certifications for all emissions units shall be submitted annually beginning 12 months from the initial permit issuance date and shall include the period from September 11, 2002 to June 30, 2003. Subsequent periodic compliance certifications shall be submitted annually from July 1 to June 30, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department."
- f) General Provision 24, page 24 is changed to read as follows: "In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of initial permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123. The term semiannual in this condition shall be defined on a calendar year basis (January 1 - June 30 and July 1 - December 31). The permittee shall submit a report for the interim period between March 11, 2003 and June 30, 2003 when the semiannual definition becomes effective."

Appendix A of this technical analysis contains the Tier I OP (issued September 11, 2002), and the technical analysis of the final Tier I OP prepared by Darrin Mehr of DEQ on August 2, 2002.

4. FEES

The Tesoro Refining and Marketing Company is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees apply in accordance with IDAPA 58.01.01.387.

5. RECOMMENDATIONS

Based on review of the submitted materials and all applicable state and federal regulations, staff recommends that DEQ issue amended Tier I Operating Permit No. TI-030403 to Tesoro Refining and Marketing Company. The permit is amended in accordance with the administrative permit amendment of IDAPA 58.01.01.381 and, thus, staff also recommends that there is no need to provide a notice to the public or affected states for this permit.

HE:sd Permit No. TI-030403

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Appendix A

Tesoro Refining and Marketing Company, Burley Terminal

Burley, Idaho

**Project No. TI-030403 (Permit Application)
Final Tier I OP (issued September 11, 2002)
August 2, 2002 Technical Analysis**

TI-030403
RECEIVED

FEB 20 2003

Department of Environmental Quality
State Air Program



TESORO

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February 17, 2003

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**Subj.: Tesoro Refining and Marketing Company
Burley Terminal
Request to Make Administrative Amendments
To Tier I Operating Permit**

Dear Mr. Rogers,

Under the provisions of IDAPA 58.01.01.381, Tesoro Refining and Marketing Company (Tesoro) submits this **"REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT"** at its Burley Terminal. Tesoro requests that each of these administrative amendments be effective upon issuance of the amended permit. These permit amendments are intended to time periodic monitoring, testing and reporting requirements on a calendar basis in lieu of basing their timing on the date of permit issuance and clarify one permit condition. Following are the administrative amendments requested by Tesoro.

1. Amend Condition 21.a. to read as follows: "The initial compliance certification for all emission units shall cover the period from September 11, 2002 (permit issuance date) to June 30, 2003 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit. Subsequent periodic compliance certifications will cover one-year periods from July 1 to June 30 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit."
2. Add the following at the end of conditions 2.4 and 2.8: "Starting July 1, 2003, the term quarterly in this condition will be defined on a calendar year basis (January 1 through March 31, April 1 through June 30, July 1 through September 30, October 1 through December 31). In the interim period between June 11, 2003 and June 30, 2003 when the quarterly definition changes, permittee will conduct at least one inspection required by this permit condition."
3. Add the following at the end of condition 2.19.2: "Starting July 1, 2003, the term semi-annual in this condition will be defined on a calendar year basis (January 1 through June 30 and July 1 through December 31). In the interim period between March 11, 2003 and June 30, 2003 when the semi-annual definition changes, permittee will conduct at least one test required by this permit condition."
4. Amend Condition 2.23 to read as follows: "On the date the provisions of 40 CFR 60 Subpart XX become applicable to the source due to the construction, reconstruction or modification of the total loading rack that delivers petroleum product into gasoline tank trucks, the permittee shall immediately comply with the